

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

GROENEVELD TRANSPORT	)	CASE NO. 1:07-CV-1298
EFFICIENCY, INC., <i>et al.</i> ,	)	
	)	JUDGE DONALD C. NUGENT
Plaintiffs,	)	
	)	<b>JOANNE SKUHROVEC'S</b>
v.	)	<b>DECLARATION IN SUPPORT OF</b>
	)	<b>PLAINTIFFS' MEMORANDUM IN</b>
JAN EISSES,	)	<b>OPPOSITION TO DEFENDANT'S</b>
	)	<b>MOTION TO DISMISS OR STAY</b>
Defendant.	)	<b>PROCEEDINGS</b>

I, JOANNE SKUHROVEC, hereby declare as follows:

1. I am an individual residing in Cuyahoga County, Ohio.
2. I am the Assistant Secretary of Plaintiff Groeneveld Transport Efficiency, Inc. ("Groeneveld Transport") and I have held this position at all times relevant to the above captioned proceedings.
3. I am the Assistant Secretary of Plaintiff Groeneveld Atlantic South, Inc. ("Groeneveld Atlantic") and I have held this position at all times relevant to the above captioned proceedings.
4. I am the Assistant Secretary of Plaintiff Groeneveld Pacific West, Inc. ("Groeneveld Pacific") and I have held this position at all times relevant to the above captioned proceedings.
5. I make this declaration upon my personal knowledge.

**EXHIBIT A**

6. Groeneveld Transport, Groeneveld Atlantic, and Groeneveld Pacific are Ohio corporations with their principal places of business in the United States.

7. Groeneveld Transport, Groeneveld Atlantic, and Groeneveld Pacific are each in the business of distributing Groeneveld Transport Efficiency International Holding B.V. automatic lubrication system products in the United States.

8. Groeneveld Transport, Groeneveld Atlantic, and Groeneveld Pacific do not conduct any business in Canada, nor did they conduct any business in Canada at any time relevant to the matters in the captioned proceeding.

9. Groeneveld Transport, Groeneveld Atlantic, and Groeneveld Pacific do not have any ownership, equity, or other interest in CPL Systems, Inc. ("CPL"), nor did they have any such interest at any time relevant to the matters in the captioned proceeding.

10. CPL does not have any ownership, equity, or other interest in Groeneveld Transport, Groeneveld Atlantic, or Groeneveld Pacific, nor did it have any such interest at any time relevant to the matters in the captioned proceeding.

11. The vast majority – if not all – of the evidence, witnesses, and documents that Groeneveld Transport, Groeneveld Atlantic, and Groeneveld Pacific will utilize to prosecute and support their claims in the captioned matter are located in the United States.

**[Signature Page Follows]**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 3, 2007 at Cleveland, Ohio.

  
\_\_\_\_\_  
JOANNE SKUHROVEC